

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	Criminal No. 1:15-CR-00223
	:	Criminal No. 1:21-CR-00100
	:	
v.	:	(Judge Conner)
	:	
JOAN CICCHIELLO	:	Electronically filed

**SUPPLEMENT TO BRIEF IN SUPPORT OF MOTION  
FOR COMPASSIONATE RELEASE AND  
REDUCTION OF SENTENCE UNDER 18 U.S.C. § 3582(c)(1)(A)**

And now, comes Joan Cicchiello, through counsel, Frederick W. Ulrich, Esquire, and Tammy L. Taylor, Esquire, of the Federal Public Defender's Office, and submits the following supplemental information in support of her request for compassionate release and reduction of sentence under 18 U.S.C. § 3582(c)(1)(A).

1. In October 2022, Joan Cicchiello filed a *pro se* request for compassionate release and reduction of sentence under 18 U.S.C. § 3582(c)(1)(A). (No. 1:21-CR-00100, Doc. 113).
2. The Federal Public Defender's Office was appointed to represent Ms. Cicchiello and filed a counseled brief in support on November 28, 2022. (No. 1:21-CR-00100, Doc. 119).

3. The government filed its brief in opposition on December 21, 2022, and undersigned counsel filed a reply brief on January 4, 2023. (No. 1:21-CR-00100, Docs. 127, 131).
4. At the time of the briefing, Ms. Cicchiello's projected release date was July 11, 2024. *See* (Doc. 119 at 7).
5. The Bureau of Prisons recently changed Ms. Cicchiello's projected release date to September 5, 2023.
6. Thus, she is requesting to be released eight months early under Section 3582(c)(1)(A).

This Court should consider Ms. Cicchiello's updated release date when ruling on her motion under 18 U.S.C. § 3582(c)(1)(A).

Date: January 11, 2023

Respectfully submitted,

/s/ Frederick W. Ulrich

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### **CERTIFICATE OF SERVICE**

I, Frederick W. Ulrich, Esquire, of the Federal Public Defender's Office, certify that I caused to be served on this date a copy of the foregoing filing via electronic case filing, and/or by placing a copy in the United States mail, first class in Harrisburg, Pennsylvania, and/or by hand delivery, addressed to the following:

Christian T. Haugsby, Esquire  
United States Attorney's Office  
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Date: January 11, 2023

/s/ Frederick W. Ulrich  
FREDERICK W. ULRICH, ESQUIRE  
Assistant Federal Public Defender